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Attorneys for Debtor,
SOUTHERN INYO HEALTHCARE DISTRICT

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re
SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

Case No.: 2016-10015

Chapter 9

FL-003

**DEBTOR'S EX PARTE MOTION TO
FILE DOCUMENTS UNDER SEAL
RELATING TO MOTION TO
DISQUALIFY ASHLEY M. MCDOW
AND FOLEY & LARDNER AS
ATTORNEYS FOR DEBTOR**

Date: N/A

Time: N/A

Place: Dept. A, Ctrm 11
U.S. Bankruptcy Court
2500 Tulare Street
Fresno, CA 93721

**EX PARTE MOTION TO FILE DOCUMENTS UNDER SEAL RELATING TO
MOTION TO DISQUALIFY ASHLEY M. MCDOW AND FOLEY & LARDNER
AS ATTORNEYS FOR THE DEBTOR**

**TO THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF CALIFORNIA:**

SOUTHERN INYO HEALTHCARE DISTRICT, the debtor in the above-captioned
bankruptcy case (the "Debtor"), hereby moves (the "Motion") for an order authorizing documents

1 to be filed under seal in connection with its *Objection to Motion to Disqualify Ashley M. McDow*
2 *and Foley & Lardner as Attorneys for Debtor* (the “Objection”), which Objection was ordered by
3 this Court to be filed no later than February 20, 2019.

4 In support of the Objection, the Debtor anticipates that it will be submitting, as exhibits to
5 the Objection or a declaration in support of the Objection, certain legal invoices generated by
6 Baker & Hostetler (“Invoices”) containing information that Healthcare Conglomerates
7 Associates, LLC and Vi Healthcare Finance, Inc. (collectively, the “Movants”) have asserted is
8 protected by the attorney-client privilege and/or is confidential. Pursuant to this Court’s order,
9 the Debtor respectfully requests that the Court authorize the filing of the Invoices under seal.
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11 11 U.S.C. §107 (b) and (c), Fed. R. Bankr. Proc. Rule 9018, and Local Rule
12 9018-1 provide that the bankruptcy court, for cause shown, may order documents to be
13 filed under seal. Here, because of the Movants’ assertion that the documents contain attorney
14 client privileged and/or confidential information, and the fact that the Court has ordered that the
15 Debtor file a motion seeking authority to file the Invoices under seal, the Debtor submits that it
16 would be appropriate for the Court to enter an order authorizing the filing of the Invoices under
17 seal.
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19 Wherefore, the Debtor respectfully requests that:
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- 21 1. The Motion be granted; and
 - 22 2. The Debtor be authorized to file the Invoices under seal.
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Dated: February 15, 2019

Respectfully submitted,

FOLEY & LARDNER LLP

By: /s/ Ashley M. McDow

Ashley M. McDow
Attorneys for Debtor, SOUTHERN
INYO HEALTHCARE DISTRICT